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MEMO ENDORSED

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October 25, 2023

Honorable Valerie E. Caproni
Thurgood Marshall
United States Courthouse
40 Foley Square, Courtroom 443
New York, NY 10007

Re: *United States v. Williams, et al.*, 21-CR-603 (6) (VEC)

Dear Judge Caproni:

We are writing to request at least a one day extension *for both defendants* to produce our exhibits, because we have identified materials (*i.e.*, exhibits) that we plan to use; our exhibits are currently due today by 5 p.m. (See Docket No. 1097). The exhibits that we intend to use were produced to us by the Government and we need to convert the material (*e.g.*, email, text messages, *etc.*) into a readable format for the jury. We do not have the ability to convert the material on our own and need the assistance of an e-discovery specialist; we are searching for such a specialist as we speak. The Defendants are also working together to identify joint exhibits to streamline our defense and to avoid duplication of efforts and presentation before the Jury.

The Government indicated that it does not oppose our request for a one day extension until tomorrow or Thursday, October 26, 2023 at 5 p.m. If we need additional time, we will both contact the Court and the Government. Thank you in advance for considering our request.

Application GRANTED. The deadline for the Defendants to produce their exhibits and exhibit list is **October 26, 2023, at 5:00 P.M.**

SO ORDERED.


10/25/2023

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

Very truly yours,

HENDERSON PARKS, LLC


Victor P. Henderson

VPH/sj